

Cindy A. Cohn (SBN 145997)  
cindy@eff.org  
Marcia Hofmann (SBN 250087)  
marcia@eff.org  
Nathan D. Cardozo (SBN 259097)  
nate@eff.org  
ELECTRONIC FRONTIER FOUNDATION  
454 Shotwell Street  
San Francisco, CA 94110  
Telephone: (415) 436-9333  
Facsimile: (415) 436-9993

Marco Simons (SBN 237314)  
marco@earthrights.org  
EARTHRIGHTS INTERNATIONAL  
1612 K Street NW, Suite 401  
Washington, DC 20006  
Telephone: (202) 466-5188

Attorneys for Non-Party Movants

**UNITED STATES DISTRICT COURT**  
**FOR THE NORTHERN DISTRICT OF CALIFORNIA**  
**SAN FRANCISCO DIVISION**

CHEVRON CORP.,

Plaintiff,

v.

STEVEN DONZIGER, *et al.*

Defendants.

Case No. 5:12-mc-80237 CRB (NC)

**DECLARATION OF MICHELLE  
HARRISON IN SUPPORT OF NON-  
PARTY MOVANTS TO QUASH  
SUBPOENAS TO GOOGLE, INC. AND  
YAHOO! INC. SEEKING IDENTITY  
AND EMAIL USAGE INFORMATION**

Date: January 16, 2013

Time: 1:00 p.m.

Place: Courtroom A, 15<sup>th</sup> Floor

Hon. Nathanael Cousins

1           1.       I, Michelle Harrison, have personal knowledge of all matters set forth in this  
2 declaration. If called upon to do so, I could and would testify to all matters set forth herein.

3           2.       I am a law clerk with EarthRights International, counsel of record for Non-Party  
4 John Doe Movants.

5           3.       EarthRights International and the Electronic Freedom Frontier represent the owners  
6 of the following email accounts: cortelyou@gmail.com, sayjay80@gmail.com,  
7 kevincoenigquito@gmail.com, marialya@gmail.com, coldmtn@gmail.com, figer@gmail.com,  
8 bandawatch@gmail.com, catmongeon@gmail.com, briansethparker@gmail.com,  
9 lupitadeheredia@gmail.com, josephmutti@gmail.com, drewwoods3@gmail.com,  
10 katiachgomez@gmail.com, tegelsimeon@gmail.com, lara\_garr@gmail.com,  
11 richard.clapp@gmail.com, ampage@gmail.com, goldstein.ben@gmail.com,  
12 wilsonaguinda@gmail.com, sara.colon@gmail.com, farihahzaman@gmail.com,  
13 jeremylow@gmail.com and courtneyrwong@gmail.com, jenbilbao3@yahoo.com,  
14 kshuk22@yahoo.com, eriktmoe66@yahoo.com, drewwoods3@yahoo.com,  
15 lupitadeheredia@yahoo.com, and Lore\_gamboa@yahoo.es. We also represent the owners of the  
16 following Microsoft email account addresses for the purpose of a separate motion to quash filed in  
17 the Northern District of New York: simeontegel@hotmail.com, mey\_1802@hotmail.com, and  
18 lupitadeheredia@hotmail.com.

19           4.       We are filing representative sample declarations from our clients in support of the  
20 motion to quash the subpoenas. We can provide additional declarations if the court requires.

21           5.       The declarations are submitted and signed by our clients using their email address  
22 only. A copy of each declaration with the account holders' true names and signatures are on file  
23 with this office.

24           6.       Attached hereto as Exhibit 1 are true and correct copies of three subpoenas issued to  
25 Google, Yahoo! and Microsoft in *Chevron Corp. v. Donziger, et al.*, Case No. 11-cv-0691 (LAK)  
26 (S.D.N.Y. filed Feb. 1, 2011).

27           7.       Attached hereto as Exhibit 2 is a true and correct copy of a September 28, 2012 blog  
28 posting by Kevin Jon Heller, My Encounter With a Chevron Subpoena--and the ACLU's

1 Assistance (Updated), available at [http://opiniojuris.org/2012/09/28/my-encounter-with-a-chevron-](http://opiniojuris.org/2012/09/28/my-encounter-with-a-chevron-subpoena-and-the-aclus-assistance/)  
2 subpoena-and-the-aclus-assistance/.

3 I declare under penalty of perjury under the laws of the United States of America that the  
4 foregoing is true and correct. Executed on October 22, 2012.

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MICHELLE C. HARRISON